

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OCEAN SEMICONDUCTOR LLC,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,
INC.,

Defendant.

Civil Action No. 6:20-cv-1216-ADA

JURY TRIAL DEMANDED

**DEFENDANT WESTERN DIGITAL TECHNOLOGIES, INC.'S
SECOND SET OF REQUESTS FOR PRODUCTION (NOS. 38 TO 42)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendant Western Digital Technologies, Inc. requests that Plaintiff Ocean Semiconductor LLC, within thirty days, provide a written response hereto and produce for examination, inspection, and copying the documents described under the heading “Documents Requested” below to the offices of Shearman & Sterling LLP, 535 Mission Street, 25th Floor, San Francisco, California 94105.

Defendant incorporates by reference the definitions and instructions from Defendant Western Digital Technologies, Inc.’s First Set of Requests for Production (Nos. 1 to 37). In addition, “Fullbrite” means Fullbrite Capital Partners, LLC and all of its predecessors and successors, all past and present parents, subsidiaries, and divisions of Fullbrite Capital Partners, LLC, and all past and present directors, officers, employees, agents, and representatives (including consultants and attorneys) of Fullbrite Capital Partners, LLC.

DOCUMENTS REQUESTED

38. Ocean’s articles of incorporation or organization, and any amendments thereto.
39. Ocean’s operating agreement(s) and any amendment thereto.

40. Documents sufficient to show Ocean's capitalization since its formation, including without limitation, all versions of any capitalization table and/or any balance sheets.

41. All Documents on which you intend to rely to demonstrate that the corporate veil should not be pierced should the Court award WDT its attorneys' fees and costs in this Action.

42. All Documents on which you intend to rely to demonstrate that Ocean should not be found to be the alter ego of Fullbrite should the Court award WDT its attorneys' fees and costs in this Action.

Dated: March 25, 2022

Respectfully submitted,

SHEARMAN & STERLING LLP

By: /s/ L. Kieran Kieckhefer

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*Attorneys for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that, on March 25, 2022, all counsel of record who have appeared in the above-captioned case were served with a copy of the foregoing by email.

/s/ Shiina Akasaka
Shiina Akasaka
Litigation Case Manager